

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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TIFFANY HARRIS, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

23-CV-344 (VEC)

-against-

PREMIUM MERCHANT FUNDING ONE, LLC
d/b/a PREMIUM MERCHANT FUNDING,

Defendant.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendant Premium Merchant Funding One, LLC (“Defendant”), by its undersigned counsel, with notice to Plaintiff Tiffany Harris, moves before the Honorable Valerie Caproni, United States District Judge, United States Courthouse, 40 Foley Square, New York, New York, to dismiss the Complaint (Dkt. 1) with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6), or, in the alternative, to strike all of the putative class allegations from the Complaint pursuant to Federal Rules of Civil Procedure 12(f) and 23.

In support thereof, Defendant relies upon the arguments set forth in the accompanying supporting Memorandum of Law.

Dated: March 10, 2023

Respectfully submitted,

/s/ Amir Alimehri
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